

# Exhibit 16



January 4, 2018

Mr. Jack N. Frost, Jr.  
Drinker Biddle & Reath LLP  
600 Campus Dr.  
Florham Park, NJ 07932-1047

Re: Review of Grids prepared by Ronald Gordon, PhD in re. Stephen Lanzo vs. Johnson and Johnson

Mr. Jack Frost,

RJ Lee Group (RJLG) received on December 22, 2017 one package from Drinker Biddle & Reath LLP. There was no damage observed to the packaging upon receipt. The package containing the grids was opened on Wednesday December 27, 2017. Inside the package was one blue TEM grid storage box, which contained eight (8) individual grids. The only label identified the grids as FA16-86LN and described that the grids were located in slots 1-A-D and 2-A-D, see Figure 1 for Mt. Sinai grid labeling. The grid box contained eight grid preparations as denoted. Each of the eight grids was photographed to show the condition of the grids upon RJLG receipt and their condition is shown in Figure 2. Each individual grid was assigned a unique RJLG sample number; Table 1 lists the grid identification numbers by location in the grid holder assigned by Mt. Sinai and their corresponding RJLG sample numbers.

Dr. Gordons report on his analysis of these grids is dated July 20, 2017. He reports observations of two (2) anthophyllite “asbestos” fibers and three (3) tremolite “asbestos” fibers in 800 grid openings in the eight lymph node grid preparations. He provided an image, EDS (energy dispersive spectroscopy), and SAED (select area electron diffraction) for each of the five (5) “asbestos” fibers. Furthermore he reported that he had analyzed 800 grid openings in the eight grid preparations. Each grid only contains 100 grid openings this means that he must have analyzed every grid opening in reaching his conclusions. He also provided to defense counsel a count sheet where he identified both grid number and grid opening wherein each of the five asbestos fibers was observed.

In the eight grids received not one of the five “asbestos” particles were present on the grids submitted to RJLG. While four of the five non-asbestos particles were able to be relocated using the methodology described below. Furthermore the images of the five “asbestos” fibers provided by Dr. Gordon have distinctly different appearance of the background residue

TEM ANALYSIS

**RJ LEE GROUP, INC**

TEM COUNT SHEET

12/28/17 1:00 PM

RJLG: LLH709228 3147898  
 Client ID: FA16-86LN\_Grid1B Shook, Hardy & Bacon, LLP Microscope: 2000i  
 Weight: Grid Area: Magnification: 10KX  
 Dilution: Filter Size: Acc. Voltage: 120 KV Operator: MMMK

|                                 |     |
|---------------------------------|-----|
| Grid Openings                   | 140 |
| Asbestos                        | 1.0 |
| Asbestos $\geq 5\mu\text{m}$    | 1.0 |
| Nonasbestos                     | 4.0 |
| Nonasbestos $\geq 5\mu\text{m}$ | 2.0 |

Comment: At least one cellulose structure in each field

| Field | Structure        | Length | Width | Structure Type | Morph | EDX            | File | Photo | SAED | Mineral ID  |
|-------|------------------|--------|-------|----------------|-------|----------------|------|-------|------|-------------|
| A1    |                  |        |       | NSD            |       |                |      |       |      |             |
| A2    |                  |        |       | NSD            |       |                |      |       |      |             |
| A3    |                  |        |       | NSD            |       |                |      |       |      |             |
| A4    | Field 75% intact |        |       | NSD            |       |                |      |       |      |             |
| A5    | Field 85% intact |        |       | NSD            |       |                |      |       |      |             |
| A6    |                  |        |       | NSD            |       |                |      |       |      |             |
| A7    |                  |        |       | NSD            |       |                |      |       |      |             |
| A8    |                  |        |       | NSD            |       |                |      |       |      |             |
| A9    |                  |        |       | NSD            |       |                |      |       |      |             |
| A10   |                  |        |       | NSD            |       |                |      |       |      |             |
| B1    |                  |        |       | NSD            |       |                |      |       |      |             |
| B2    |                  |        |       | NSD            |       |                |      |       |      |             |
| B3    |                  |        |       | NSD            |       |                |      |       |      |             |
| B4    | Field 80% intact |        |       | NSD            |       |                |      |       |      |             |
| B5    | Field 75% intact |        |       | NSD            |       |                |      |       |      |             |
| B6    |                  |        |       | NSD            |       |                |      |       |      |             |
| B7    | 1                | 27.5   | 0.5   | Amphibole      | F     | NaMgSiFe ✓ ✓ ✓ |      |       |      | Crocidolite |
| B8    |                  |        |       | NSD            |       |                |      |       |      |             |
| B9    |                  |        |       | NSD            |       |                |      |       |      |             |
| B10   |                  |        |       | NSD            |       |                |      |       |      |             |
| C1    |                  |        |       | NSD            |       |                |      |       |      |             |
| C2    | Field 95% intact |        |       | NSD            |       |                |      |       |      |             |
| C3    | Field 95% intact |        |       | NSD            |       |                |      |       |      |             |
| C4    |                  |        |       | NSD            |       |                |      |       |      |             |
| C5    | Field 95% intact |        |       | NSD            |       |                |      |       |      |             |
| C6    |                  |        |       | NSD            |       |                |      |       |      |             |
| C7    |                  |        |       | NSD            |       |                |      |       |      |             |
| C8    |                  |        |       | NSD            |       |                |      |       |      |             |
| C9    |                  |        |       | NSD            |       |                |      |       |      |             |
| C10   |                  |        |       | NSD            |       |                |      |       |      |             |
| D1    | Field 10% intact |        |       | NSD            |       |                |      |       |      |             |
| D2    | Field 90% intact |        |       | NSD            |       |                |      |       |      |             |
| D3    |                  |        |       | NSD            |       |                |      |       |      |             |
| D4    |                  |        |       | NSD            |       |                |      |       |      |             |
| D5    |                  |        |       | NSD            |       |                |      |       |      |             |
| D6    |                  |        |       | NSD            |       |                |      |       |      |             |
| D7    | Field 75% intact |        |       | NSD            |       |                |      |       |      |             |
| D8    |                  |        |       | NSD            |       |                |      |       |      |             |
| D9    |                  |        |       | NSD            |       |                |      |       |      |             |
| D10   |                  |        |       | NSD            |       |                |      |       |      |             |
| E1    |                  |        |       | NSD            |       |                |      |       |      |             |
| E2    |                  |        |       | NSD            |       |                |      |       |      |             |
| E3    |                  |        |       | NSD            |       |                |      |       |      |             |
| E4    |                  |        |       | NSD            |       |                |      |       |      |             |
| E5    |                  |        |       | NSD            |       |                |      |       |      |             |
| E6    |                  |        |       | NSD            |       |                |      |       |      |             |
| E7    |                  |        |       | NSD            |       |                |      |       |      |             |
| E8    |                  |        |       | NSD            |       |                |      |       |      |             |
| E9    |                  |        |       | NSD            |       |                |      |       |      |             |
| E10   | Field 25% intact |        |       | NSD            |       |                |      |       |      |             |
| F1    |                  |        |       | NSD            |       |                |      |       |      |             |
| F2    |                  |        |       | NSD            |       |                |      |       |      |             |
| F3    |                  |        |       | NSD            |       |                |      |       |      |             |
| F4    |                  |        |       | NSD            |       |                |      |       |      |             |
| F5    |                  |        |       | NSD            |       |                |      |       |      |             |
| F6    |                  |        |       | NSD            |       |                |      |       |      |             |
| F7    |                  |        |       | NSD            |       |                |      |       |      |             |
| F8    |                  |        |       | NSD            |       |                |      |       |      |             |
| F9    |                  |        |       | NSD            |       |                |      |       |      |             |
| F10   | Field 50% intact |        |       | NSD            |       |                |      |       |      |             |

Abbreviations: F - Fiber, C - Cluster, B - Bundle, M - Matrix, Cle - Cleavage, Asb - Asbestiform, Bys - Byssolite

Initial Review: Monica McGrath-Koerner 12/28/17

Final Review: Matt Sanchez 01/03/17

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